

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

By ECF

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: <u>1/9/20</u>

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

January 7, 2020

*Jo ordered
1-9-2020
Alv Hellerstein*

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Justin Harrigan
19 Cr. 864 (AKH)**

Dear Judge Hellerstein:

I write to request a modification of Mr. Harrigan's bail conditions to allow him to participate in job training. Mr. Harrigan is currently out on bail, but with home incarceration and electronic monitoring as conditions of his release. Mr. Harrigan seeks a modification of those conditions to enroll in an eight-week construction training program through Families Forward, an agency that provides job training for parents who owe child support.

Mr. Harrigan has a pending child support matter in Family Court. He has been deemed eligible for a construction job training program that will allow him to obtain technical skills and 30 hours of certification. The program will also provide interview training and access to a network of employers. Upon completion of the job training program, Mr. Harrigan will be able to lower his child support debt.

Mr. Harrigan is a 29-year old man who has held a number of jobs over the course of his adult life. Prior to his arrest, he was working and also actively involved in the lives of his four young children. While out on bail, Mr. Harrigan has been compliant with all mandates set forth by the Court and Pretrial Services. Mr. Harrigan reports regularly to Pretrial Services, and is testing negative for all illicit substances. He is also in regular communication with both his Pretrial Services officer and with my office.

Home incarceration is not necessary to ensure safety to the community or Mr. Harrigan's return to court. Further, it fails to serve any societal interest to have Mr. Harrigan confined to his home and unable to be a productive member of his community and his family. Mr. Harrigan has demonstrated his respect for this

Court's orders, and has been fully compliant with all of the conditions of his release. He is eager to better himself, improve his job prospects, and begin to repay his child support debt. A modification of his bail conditions would allow him to do that.

Pretrial Services Officer John Moscato does not object to this request. The Government by AUSA Kaylan Lasky does not object to this request.

Thank you for your consideration.

Sincerely,



Tamara L. Giwa
Assistant Federal Defender
Federal Defenders of New York
(212) 417-8719

Cc: AUSA Kaylan Lasky (via ECF)
Pretrial Services Officer John Moscato (via email)